

FILED

MAY 16 2006

**Board of Vocational Nursing
and Psychiatric Technicians**

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**BEFORE THE
BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. VN-2006-615

**STEVEN BROWN, AKA
STEVEN WAYNE BROWN**
39842 Creative Drive
Temecula, California 92591

A C C U S A T I O N

Vocational Nurse License No. VN 218616

Respondent.

Teresa Bello-Jones, J.D., M.S.N., R.N. ("Complainant") alleges:

PARTIES

1. Complainant brings this Accusation solely in her official capacity as the Executive Officer of the Board of Vocational Nursing and Psychiatric Technicians ("Board"), Department of Consumer Affairs.

Vocational Nurse License

2. On or about January 11, 2006, the Board issued Vocational Nurse License Number VN 218616 ("license") to Steven Brown ("Respondent"), also known as Steven Wayne Brown. The license will expire on October 31, 2009.

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1 **COST RECOVERY**

2 7. Code section 125.3 provides, in pertinent part, that the Board may request
3 the administrative law judge to direct a licentiate found to have committed a violation or
4 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation
5 and enforcement of the case.

6 **FIRST CAUSE FOR DISCIPLINE**

7 **(Criminal Conviction)**

8 8. Respondent has subjected his license to discipline under Code section
9 2878, subdivision (f), in that on June 8, 2007, in the Superior Court, County of Kern, Kern River
10 Judicial District, California, in the case entitled *People of the State of California vs. Steven*
11 *Wayne Brown*, (Super. Ct., Kern Cty., Kern River Judicial Dist., 2006, Case No. KM017633A),
12 Respondent was convicted by the court on his plea of nolo contendere of violating Vehicle Code
13 section 23103.5, subdivision (a) (wet/reckless), a misdemeanor. The circumstances of the crime
14 are that on or about June 15, 2005, Respondent was arrested for driving erratically and while
15 under the influence of alcohol. Such conduct is substantially related to the qualifications,
16 functions and duties of a licensed vocational nurse.

17 **SECOND CAUSE FOR DISCIPLINE**

18 **(Conviction of a Crime Involving Alcoholic Beverages)**

19 9. Respondent has subjected his license to discipline under Code section
20 2878.5, subdivision (c), on the grounds of unprofessional conduct, in that Respondent has been
21 convicted of a crime involving alcoholic beverages, as more particularly set forth in paragraph 8,
22 above.

23 **THIRD CAUSE FOR DISCIPLINE**

24 **(Use Alcohol to an Extent or in a Manner Dangerous**
25 **or Injurious to Himself or Others)**

26 10. Respondent has subjected his license to discipline under Code section
27 2878.5, subdivision (b), on the grounds of unprofessional conduct, in that in or about

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1 March 18, 2005, Respondent used alcoholic beverages to an extent or in a manner dangerous or
2 injurious to himself or others, as more particularly set forth in paragraph 8, above.

3 **MATTERS IN AGGRAVATION**

4 11. On June 5, 2005, in the Superior Court, County of San Diego, California,
5 in the matter entitled *People vs. Steven Wayne Brown*, (Super. Ct., San Diego Cty., 2005, Case
6 No. S193074), Respondent was convicted by the court on his plea of guilty of violating Vehicle
7 Code section 23152, subdivision (b) (drive a vehicle with a blood alcohol level of 0.08 percent or
8 more), a misdemeanor.

9 **PRAYER**

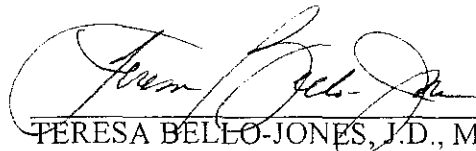
10 WHEREFORE, Complainant requests that a hearing be held on the matters herein
11 alleged, and that following the hearing, the Board of Vocational Nursing and Psychiatric
12 Technicians issue a decision:

13 1. Revoking or suspending Vocational Nurse License Number VN 218616,
14 issued to Steven Brown, also known as Steven Wayne Brown;

15 2. Ordering Steven Brown, also known as Steven Wayne Brown to pay the
16 Board of Vocational Nursing and Psychiatric Technicians the reasonable costs of the
17 investigation and enforcement of this case, pursuant to Code section 125.3; and,

18 3. Taking such other and further action as deemed necessary and proper.

19 DATED: May 16, 2008

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21 TERESA BELLO-JONES, J.D., M.S.N., R.N.

22 Executive Officer

23 Board of Vocational Nursing and Psychiatric Technicians

24 Department of Consumer Affairs

25 State of California

26 Complainant

27 03595110-SD2007802977

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ps (3/5/08)